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VIA ELECTRONIC FILING

January 24, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Technology Transitions Task Force Request for Comment on Potential IP Interconnection Trials
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition
GN Docket Nos. 13-5 and 12-353
Notice of Oral Ex Parte Communication

Dear Ms. Dortch:

This notice is filed to report that Barry Ohlson of Cox Enterprises, Inc., Steven Wisniewski of Cox Communications, Inc. ("Cox") and the undersigned, all representing Cox, met with Amy Bender of Commissioner O'Rielly's office on January 23 to discuss issues in the above-referenced proceedings.[1]

The specific topics discussed during the meeting are described on the attachment, which was provided to Ms. Bender. During the meeting, Cox also noted that its description of appropriate parameters for any IP interconnection trials did not mean that it proposes conducting such trials or supports any particular interconnection trial proposal.[2]

In accordance with the requirements of Section 1.1206 of the Commission's Rules, this notice is being filed with the Commission within two business days of the meeting that is disclosed herein and a copy is being provided to Ms. Bender.

[1] Mr. Wisniewski participated in the meeting by conference call.
[2] *See* Public Notice, Technology Transitions Task Force Seeks Comments on Potential Trials, GN Docket No. 13-5, DA 13-1016 (rel. May 10, 2013).

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Please inform me if any questions should arise in connection with this notice.

Respectfully submitted,

J.G. Harrington
Counsel to Cox Communications, Inc.

Attachment

cc (w/o attach): Amy Bender

COX COMMUNICATIONS INC.

IP Transition Trials

January 23, 2014

- **Cox supports Commission efforts to oversee the IP transition.**

  - *Cox's network transition is well underway*

  While Cox currently operates a hybrid TDM-IP network, the company is steadily converting its network to IP. Most of Cox's switching is already IP-enabled, but interconnection is still largely TDM-based because Cox entered the phone business as a TDM provider and current industry practices generally require TDM interconnection at the local level.

  - *Oversight of the transition is necessary*

  The ongoing transition from TDM to IP is a significant milestone in the development of U.S. and international telecommunications networks. It is important that this transition be managed to avoid unnecessary disruption to customers and service providers.

  Cox is presently expending considerable capital and effort to implement the transition of its network to IP technology. Any trial should be mindful of the incremental resources carriers must commit so as not to detract from carriers' ongoing transition efforts.

  - *The benefits of IP interconnection are expected to be significant*

  The benefits of IP-based networks are significant for interconnection. For instance, IP networks require fewer switches, and points of interconnection may be more geographically dispersed. Cox envisions the use of significantly fewer points of interconnection for IP, as compared to the dozens of locations required to support its existing TDM-based services.

- **IP interconnection trials can assist the Commission and the industry in the transition if the parameters for those trials are defined carefully.**

  - *The FCC must be mindful of the business impact of "voluntary" trials*

  Any trial could have a significant and disproportionate business impact on providers and, most importantly, their customers. In addition, trials could force providers to divert resources from their existing transition efforts.

  - *Trials should be designed to be non-disruptive and reversible*

  Service providers must be able to continue to route PSTN traffic via standard TDM interconnection during any trial and afterwards so as to limit the risk of service disruption, particularly to entities that are not participating directly. In the event that a form of IP interconnection being trialed fails or suffers degraded quality for any period of

time, this parallel path will provide a critical fallback capability that will be needed to promptly restore high-quality service.

- *Trials should address significant technical factors*

Technical considerations that may be significant to post-transition operations can be addressed in trials, such as the number of points of interconnection that are necessary and reasonable for a particular geography when IP interconnection is implemented. This may include scenarios that test different architectures to ensure sufficient redundancy.

- *Trials can be helpful in defining operations processes*

Much of the work in a trial will involve determining what processes work best for establishing connections; forecasting demand and sizing facilities accordingly; and diagnosing and addressing faults. Trials also can help define processes inherent to interconnection and traffic exchange, as well as understanding how the best approaches to these processes differ from those used for TDM interconnection. This evaluation is important to the smooth implementation of IP interconnection.

- *Analysis of trial results should be publicly available to ensure all industry participants benefit from what is learned*

All trials should evaluate impacts on call completion and call quality. The analysis should be non-carrier specific so as to encourage participation and accurate reporting of issues.

- *Trials should not affect the underlying legal framework for interconnection*

Cox agrees with the Task Force that trials should not be used to evaluate the legal framework for interconnection. In particular, a trial is unlikely to provide useful information on how interconnection negotiations will go in the "real world" because the parties' incentives will not be the same.

Still, trials will require guidelines or ground rules for documenting the relationships between participants and setting the terms for traffic exchange solely for purposes of conducting the trials on a temporary basis to ensure customer protection. These terms should apply only during the trials.